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SUPERFUND DIVISION

PEPER, MARTIN, JENSEN, MAICHEL AND HETLAGE
ATTORNEYS AT LAW

2080 MCGREGOR BOULEVARD
THIRD FLOOR
FORT MYERS, FLORIDA 33901-3419
(941) 337-3850

720 WEST MAIN STREET
BELLEVILLE, ILLINOIS 62220-1515
(618) 234-9574

TWENTY-FOURTH FLOOR
720 OLIVE STREET
ST. LOUIS, MISSOURI 63101-2396

(314) 421-3850
TELECOPY: (314) 621-4834

1625 WEST MARION AVENUE
PUNTA GORDA, FLORIDA 33950-5295
(941) 637-1955

850 PARK SHORE DRIVE
SUITE 202
NAPLES, FLORIDA 33940-3587
(941) 261-6525



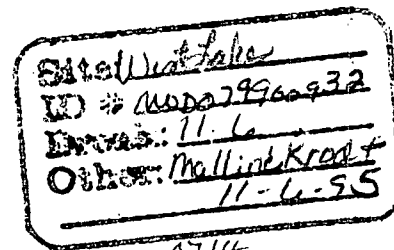
40045838
SUPERFUND RECORDS

WRITER'S DIRECT DIAL NUMBER

(314) 444-6452

November 6, 1995

Steven Kinser, Project Manager
U. S. Environmental Protection Agency, Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101



Re: ***Supplemental Response to 104(e) Information Request
West Lake Landfill; Bridgeton, Missouri***

Dear Mr. Kinser:

This response is a supplement made on behalf of Mallinckrodt Group, Inc., formerly known as Mallinckrodt, Inc., ("Mallinckrodt") to an Information Request sent by Robert L. Morby, with regard to the West Lake Landfill Site ("West Lake") located in Bridgeton, Missouri. The U.S. Environmental Protection Agency ("EPA") issued this Request on February 11, 1994 pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"). Mallinckrodt initially responded to the Request on March 22, 1994.

Without waiving any of the objections raised in Mallinckrodt's earlier response, Mallinckrodt now supplements its original response as a result of new information discovered subsequent to Mallinckrodt's initial response.

Request No. 1

Without waiving its previous objection to this Request, Mallinckrodt supplements its earlier response to Request No. 1 because of new information. Mallinckrodt states that its subsidiary, Mallinckrodt Chemical, Inc. ("MCI") operates a specialty chemical and pharmaceutical manufacturing facility at 3600 N. Second Street, St. Louis, Missouri, from which one shipment of non-hazardous demolition debris was mistakenly shipped to the West Lake Landfill on March 1, 1995.

Request No. 2

Without waiving its previous objection to this Request, Mallinckrodt supplements its earlier response to Request No. 2 because of new information.

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(2.a)

Mallinckrodt states that one shipment (Shipment No. 1567) of non-hazardous building demolition debris from Building 91 was mistakenly transported from its St. Louis facility to the West Lake Landfill on March 1, 1995. Although the approved landfill for this material was Browning-Ferris Industries' Missouri Pass Landfill at 2520 Adie Road in Maryland Heights, Missouri, the material was for some unknown reason transported by Able Industries (a.k.a Johnny on the Spot) to the West Lake Landfill without Mallinckrodt's approval.

(2.b)

Mallinckrodt states that the material giving rise to this Supplemental Response was non-hazardous building demolition debris.

(2.c-e)

Mallinckrodt states that the amount of non-hazardous building demolition debris sent to the site was approximately twenty (20) cubic yards. A twenty (20) cubic yard dumpster was used to contain the materials eventually mistakenly disposed of at the West Lake Landfill.

(2.f-g)

Mallinckrodt states that the Environmental Services Department at its St. Louis facility arranged for the pick up, transport and disposal of this material with Able Industries and Browning-Ferris Industries. The disposal of this material in the West Lake Landfill was not approved by Mallinckrodt — the Browning-Ferris Industries Missouri Pass Landfill in Maryland Heights, Missouri was the disposal facility designated and approved by Mallinckrodt for receipt of this material. It is unknown by Mallinckrodt why Able Industries, 7151 N. Market, St. Louis, Missouri transported the materials to the West Lake Landfill.

Request No. 3

Without waiving its previous objections to this Request, Mallinckrodt further supplements its response to Request No. 3 because of new information. Mallinckrodt states that no analysis was performed in regard to this load of demolition debris transported from its St. Louis facility.

Request No. 4

Without waiving its previous objection to this Request, Mallinckrodt further supplements its response to Request No. 4 because of new information. Mallinckrodt states that the Environmental Services Department at its St. Louis facility arranged for the pickup, transport and disposal of the building demolition debris with Able Industries and Browning-Ferris Industries.

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Request No. 5

Without waiving its previous objections to this Request, Mallinckrodt further supplements its response to Request No. 5 because of new information. Mallinckrodt states that it has not performed and has not had performed any study or investigation to determine the existence and extent of contamination at or near the site other than an internal investigation to supplement this Request. Furthermore, attempts by Mallinckrodt to remove this material from the West Lake Landfill were unsuccessful as the material could not be located within the landfill.

Request No. 6

Without waiving its previous objection to this Request, Mallinckrodt further supplements its response to Request No. 6 because of new information. With respect to the building demolition material giving rise to this Supplemental Response, Mallinckrodt states that no permit or other authorization was obtained nor required for disposal of this material.

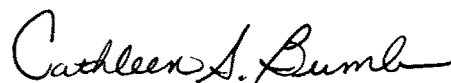
Request No. 7

Without waiving its previous objection to this Request, Mallinckrodt further supplements its response to Request No. 7 because of new information. Mallinckrodt states that it issued a purchase order dated November 10, 1994, which was revised December 9, 1994 and January 10, 1995, to Able Industries to haul debris from a plant project which is attached as document number 001. The manifest for the disposal of this waste, designating BFI's Missouri Pass landfill as the receiving facility, is enclosed as document number 002. Able Industries' work order is attached as document number 003. The work order indicates the material is to be dumped at a Laidlaw landfill. However, the identity of the person who signed the work order authorizing disposal is unknown to Mallinckrodt at this time and may be a representative of a Mallinckrodt construction contractor (Rhodey & Son).

* * * * *

If you have any questions with regard to the foregoing, please contact Patricia Hitt Duft, Senior Attorney at Mallinckrodt Chemical, Inc., at (314) 530-2314.

Sincerely yours,



Cathleen S. Bumb

Enclosures

cc: Patricia Hitt Duft, Esq.

Dennis A. Ornkro		007038H10-000000000	
Order No.	Delivery No.	Work Order	Depository No.
JOE LY MYERS 23	B-503	AREA 2 503	
01	Area: 00013 Cost Code: 80 Project: 7314		

MALLINCKRODT CHEMICAL
 Send Invoice in Triplicate to:
 Mallinckrodt Chemical, Inc.
 P. O. Box 5439, St. Louis, MO 63147
 Tel: (314) 300-2000 Fax: (314) 300-1248
 *** See Text ***

SELLER:

ABLE INDUSTRIES
 Becky Sanson
 7151 N. MARKET
 ST. LOUIS MO 63133

Date: 10/24/84
 Purchase Order No.: E 7314-1012

IMPORTANT
 This is a Multi-Access
 on an FPO/DFCS pack.
 The List, Packages, and
 Compositions.

PURCHASE ORDER

Mallinckrodt Chemical, Inc.

☒ SEE TEXT

☐ 3440 N. Broadway, St. Louis, Mo. 63147

☐ 210 Salisbury, St. Louis, Mo. 63147

QUANTITY	TERMS	DATE REQUIRED
BEST WAY	NET 30 DAYS	E.P.
<small>If lower transportation charges result, Mallinckrodt hereby authorizes the use of ICC released rates.</small>		<input type="checkbox"/> Exempt from Sales Tax <input checked="" type="checkbox"/> SEE TEXT

ITEM	QUANTITY	DESCRIPTION	PRICE
		MALLINCKRODT CHEMICAL, INC. P. O. BOX 5439 ST. LOUIS, MO 63147 ATTN: VICTORIA KIZILE, Z-4	

Special Instructions:

Mallinckrodt Chemical, Inc. (Buyer)
 St. Louis-Plant
 Purchasing Department

Authorized Signature

C-04127 (3-84)

PURCHASING FILE COPY NISCHORD HECJ ICW WZ2:2T 56. 90 AON

WLLFOIA4312 - 010 - 0127321

Req. No.	Job Location	Account No.	Work Order	Project No.	Task	Cost Code	Seq.
Molly Myers	AREA 2 503	007-03-381-0405-0000-0000	314-539-1548	B-503			
		Send Invoice to:		PURCHASE ORDER			

**MALLINCKRODT
CHEMICAL**

MALLINCKRODT CHEMICAL, INC.
ATTN: VICKI KEZELE
P.O. BOX 5439
ST. LOUIS MO 63147

Date	Purchase Order No.
12/09/94	CHANGE ORD# 1 017501-DAC-01
PO Type	IMPORTANT: This order must appear on all INVOICES, Packing Lists, and Correspondence.
ENG	

SELLER:

8148638755

110102

ABLE INDUSTRIES
Becky Sansom
7151 N. MARKET
ST. LOUIS MO 63139

MALLINCKRODT CHEMICAL, INC.
MECHANICAL RECEIVING
210 SALISBURY ST
SAINT LOUIS MO 63147

ROUTING	TERMS	P.O.B.	TAX STATUS	BLANKET NO.	DATE REQ.
BEST WAY	NET 30 DAYS	Shipping Point	TAXABLE		9/00/00

LINE NO.	QUANTITY	DESCRIPTION	PRICE
20	1 LT	<p>This is a summary of changes made on 12/09/94.</p> <p>Vendor please note, the PO number has been changed from 7314-1012 to 017501. Please indicate the new number on all documentation.</p> <p>The PO taxation status was changed.</p> <p>Line 20 has been added.</p> <p>ADDITIONAL T&M FOR ROLL-OFF BOXES TO STORE EXCAVATED MATERIAL.</p> <p>TOTAL COST NOT-TO-EXCEED \$20,000.00</p> <p>ALL OTHER TERMS AND CONDITIONS SHALL REMAIN THE SAME AS ON THE ORIGINAL PURCHASE ORDER.</p> <p>THE MONETARY CONSIDERATION IS CHANGED FROM \$5,000.00 TO \$20,000.00.</p>	15,000.0000 LT

Special Instructions:

Mallinckrodt Chemical, Inc. (Buyer)
St. Louis Plant
Purchasing Department

Authorized Signature

DENNIS A. CRINKO

PURCHASING FILE COPY NOV 94 12:30PM MCI MECH PURCHASING 04127 (10)

Molly Myers		7-3	314-539-1548	H-503	Deliver to:	
Req. No.	Job Location	Account No.	Work Order	Project No.	Task	Cost Code
	AREA 2 503	007-03-381-0405-0000-0000		PR07314-00000013-8005	01012	

**MALLINCKRODT
CHEMICAL**

Send invoice to:

MALLINCKRODT CHEMICAL, INC.
ATTN: VICKI KRZELE
P.O. BOX 5438
ST. LOUIS MO 63147

PURCHASE ORDER

Date	Purchase Order No.
1/10/95	CHANGE ORD# 2 017501-DAC-01
PO type	IMPORTANT The above PO must appear on SHIPMENTS. Packing List, Packing and Correspondence
YONG	

SELLER:

3148638755

110102

ABLE INDUSTRIES
Becky Sansom
7151 N. MARKET
ST. LOUIS MO 63133

SHIP
TO

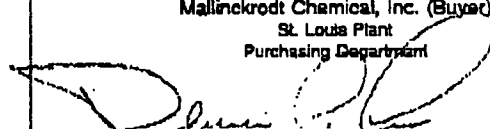
MALLINCKRODT CHEMICAL, INC.
MECHANICAL RECEIVING
210 BALISBURY ST
SAINT LOUIS MO 63147

ROUTING	TERMS	F.O.B.	TAX STATUS	BLANKET NO.	DATE REQ.
BEST WAY <small>lower transportation charges result Mallinckrodt hereby authorizes the use of ICC released rates.</small>	NET 30 DAYS	Shipping Point	TAKABLE		0/00/00

LINE NO.	QUANTITY	DESCRIPTION	PRICE
30	1 LT	<p>This is a summary of changes made on 01/10/95.</p> <p>Vendor please note, the PO number has been changed from 7314-1012 to 017301. Please indicate the new number on all documentation.</p> <p>Line 30 has been added.</p> <p>ADDITIONAL T&M FOR STORAGE AND HAULING OF SPECIAL WASTE FOR B503.</p> <p>THE TOTAL COST IS NOT-TO-EXCEED \$25,000.00</p> <p>ALL OTHER TERMS AND CONDITIONS SHALL REMAIN THE SAME AS ON THE ORIGINAL PURCHASE ORDER.</p> <p>THE MONETARY CONSIDERATION IS CHANGED FROM \$20,000.00 TO \$25,000.00.</p>	5,000.0000 LT

Special Instructions:

Mallinckrodt Chemical, Inc. (Buyer)
St. Louis Plant
Purchasing Department


Authorized Signature
DENNIS A. CRNK

NON-HAZARDOUS SPECIAL WASTE MANIFEST

BLDG: B91 Box 2143

Shipment: 01567

GENERATOR

Generator Name and Location
Hallingford Chemical, Inc.
3600 N. Second St.
St. Louis MO 63147

Phone
(314) 539-1600

Description of Waste

Approval Code

Cubic Yards

BUILDING DEBRIS (4/1/95)

1284K-B950

20.00

2675/5,000

SHIPMENT TOTAL:

20.00

I hereby certify that the above named material does not contain free liquid as defined by 40 CFR Part 260.10 or any applicable state law, is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and

Signature: SKARIN

Signature

Shipment Date: 3-1-95

TRANSPORTER

Transporter Name and Address

JOHNNY ON THE SPOT
2151 N. MARKET
ST. LOUIS MO 63133
(314) 863-8755

Driver Name (Print)

Vehicle License No./State

Vehicle Certification

John G. Brinkman
314-863-8755
903

I hereby certify that the above named material was picked up at the generator site listed above.

Signature: John G. Brinkman

Shipment Date: 3-1-95

I hereby certify that the above named material was delivered without incident to the destination listed above.

Signature: John G. Brinkman

Delivery Date: 3-1-95

DESTINATION

Designated Facility Name & Site Address

Browning-Ferris Ind. MO. Pass Landfill
2520 Adie Road
Maryland Heights MO 63043

Phone

(314) 993-0477

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

Signature: Robert M. Telford

Signature: Robert M. Telford

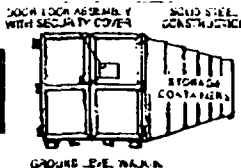
Receipt Date: 3-1-95

MARCH 1, 1995

002



SITE SERVICES



Emergency Service Company

T. LOUIS, MO 314/863-8874 ST. CHARLES, MO 314/723-6097
 COLLINSVILLE, IL 618/344-1242 COTTAGE HILLS, IL 618/259-3608

No. 57954

DRIVER NO:

93

9853-6

DELIVERY SERVICE AND PLACEMENT AUTHORIZATION WORK ORDER

CUSTOMER

Altoy & Son

DATE 2-1-95 TIME MAR 14 1995 a.m./p.m.

TIME LEFT GATE AT SHOP a.m./p.m. TIME ARRIVED AT SHOP a.m./p.m.

PROJECT LOCATION Mallinckrodt

TIME ARRIVED 1035 a.m./p.m. TIME DEPARTED 1110 a.m./p.m.

WEATHER HOW MANY CONTAINERS ON JOB?

NEW DELIVERY CONTAINER NO'S 258 ul PICK-UP CONTAINER NO'S 2143 ul

PUMP AND RETURN CONTAINER NO'S ZONE 1

CUSTOMER OWNED CONTAINERS YES ☒ NO

CONTAINER SIZE 20 DUMPED AT LANDFILL NAME Madison

TIME ARRIVED AT LANDFILL a.m./p.m. TIME DEPARTED LANDFILL a.m./p.m.

CONTAINER COULD NOT BE PULLED, BROUGHT TO SHOP OR TAKEN FROM SHOP TO CUSTOMER OR LANDFILL, EXPLAIN IN COMMENT SECTION

COMMENTS

DR

RECEIVED IN GOOD CONDITION YES NO DAMAGED YES NO COMMENTS

PERMITS AND DRIVEWAY ACCESS: Customer warrants that it shall secure and maintain all necessary permits and that Contractor shall have the right to place Containers in the locations designated by Customer. Customer also warrants that the right of way between these locations and the public right of way will at all times be (a) clear so that Contractor may provide service hereunder, and (b) sufficient to bear the weight of all of Contractor's vehicles and equipment, and that Contractor shall have the right to use such right of way in providing service hereunder. Contractor shall not be liable for any damage to pavement or other driving surfaces, or to curbs, resulting from Contractor's providing of service hereunder.

AUTHORIZATION FOR PLACEMENT AND/OR SERVICE

LOAD LIMIT 22,000 LBS.

CUSTOMER Paul Baron

TITLE

SERVICED BY Dave FOREMAN ON JOB

IF NOT SIGNED, GIVE REASON

WORK ORDER

NO. 1-091486

TIME IN a.m./p.m. SALE/QUOTE/RENTAL

DATE 3-1-95 PER

PHONE NO. 1 1539-5888 DEL./P.U. DATE

BILL TO Rhodney

ADDRESS

P.O. NO. JOB NO.

COST CODE ORDER WRITTEN BY Tomp

DELIVER Mallinckrodt

Building # 96

PICK-UP Dump & Return 20 yd.

ASAP

DRIVER'S REPORT

DATE

003